Federal Defenders
OF NEW YORK, INC.

Southern District
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David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

January 6, 2022

Application GRANTED. Defense motions shall be filed by February 25, 2022. The Government's opposition is due by March 11, 2022. Any reply is due by March 18, 2022. The pretrial conference is hereby ADJOURNED to March 2, 2022 at 2:30 p.m. Time is excluded under the Speedy Trial Act from today, January 6, 2022, until March 2, 2022, for the reasons set forth in defense counsel's letter. The Clerk of Court is directed to terminate Doc. #51. SO ORDERED.
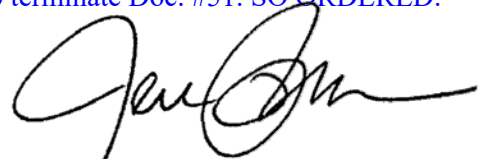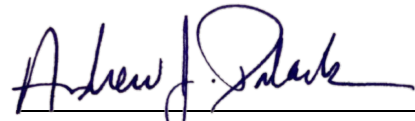
January 6, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: **United States v. Alhassan et al.**
      21 Cr. 523 (JMF)

Dear Judge Furman:

I represent Abdul Mumuni and write on behalf of the parties regarding the upcoming Rule 12 deadline and status conference in the above-captioned case, currently scheduled for January 7 and January 13, 2022, respectively.

Presently, all of the defendants are engaged in productive negotiations with the Government regarding a potential pre-trial resolution of their respective cases. To afford adequate time for the parties to see these negotiations through and finalize written plea agreements, the defendants respectfully request a 45-day adjournment of the existing deadlines. The Government does not object to this application. The defendants further consent to the exclusion of this additional period of delay from Speedy Trial Act calculations because the additional time is necessary to finish productive plea negotiations and achieve a pre-trial resolution. 18 U.S.C. § 3161(h)(7)(A).

Respectfully Submitted,

Andrew J. Dalack, Esq.
Assistant Federal Defender

Cc: Counsel of Record

Counsel for Abdul Mumuni